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UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

In re: HAI and LIENG K. TROUNG, Debtors.	Case No. 12-55682 Chapter 7 **No hearing requested**

EX PARTE MOTION BY UNITED STATES TRUSTEE TO REOPEN CHAPTER 7 CASE PURSUANT TO 11 U.S.C. §350(B)

Tracy Hope Davis, the United States Trustee for Region 17 (the "UST"), hereby moves the Court on an ex parte basis for an order reopening this case pursuant to 11 U.S.C. § 350(b). The Declaration of Marc Del Piero ("Del Piero Declaration") in support of this Motion is filed concurrently herewith.

1. This Chapter 7 case was filed on July 31, 2012. On October 14, 2014, the Court filed its final decree, and Marc Del Piero was discharged of all duties as trustee in the case. The case was closed on October 14, 2014.

2. Based on the Del Piero Declaration filed in support of this Motion, there appears to be good cause to reopen this case to administer undisclosed assets, a cause of action, identified as Superior Court of the State of California, County of Santa Clara, Case No. 113 CV 254614.

3. As there appear to be assets which can be liquidated and distributed to creditors, to protect the interests of creditors and the Debtors and to ensure the efficient administration of the estate, a Chapter 7 trustee should be appointed pursuant to F.R.B.P. 5010. Presuming the Court will order the appointment of a trustee, for the purpose of efficiencies and so that the Chapter 7 trustee may take immediate action, the Appointment of Marc Del Piero as Trustee ("Appointment") is being filed in conjunction with this motion and an associated proposed form of order. The Appointment is contingent upon the Court entering an order reopening this case, vacating the final decree and directing the UST to appoint a Chapter 7 trustee.

WHEREFORE, the UST requests that the Court enter an order reopening this case pursuant to 11 U.S.C. § 350(b) and ordering the UST to appoint a Chapter 7 trustee.

Dated: April 20, 2016

Tracy Hope Davis,
United States Trustee

By: *__/s/ Shining J. Hsu*
Trial Attorney
Office of the U.S. Trustee

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